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Chairman Daniel R. Elliott III
 Surface Transportation Board
 395 E Street, S. W. - Suite 1220
 Washington, DC 20423-0001

April 8, 2011

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RE: Ex Parte No. 705

Dear Chairman Elliott:

I write today concerning the STB proceeding in Ex Parte No. 705, the purpose of which is to consider the competitive marketplace in the railroad industry. I represent, Interdom Partners, Ltd. My company arranges for the transportation of trailers and containers on the various Class I railroads in North America. We are currently one of the largest intermodal carriers within the United States.

Since the passage of the Staggers Act in 1980, the nation's railroads have evolved from being an industry in serious decline to an industry that is competing in the freight transportation world. While I think there are many different reasons for this success story, I don't think anyone should underestimate the foresight shown by Congress, the Interstate Commerce Commission before 1996, and the STB after that time in providing the appropriate regulatory structure that promotes, enhances and grows the railroad industry. I applaud our government for nurturing the national treasure that is our railroad industry.

I know that some customers believe that changing the regulatory structure will benefit their own interest. However, such a change actually could harm many more shippers in the long run. By taking actions that could reduce railroad revenue, which in turn will harm the interest of intermodal customers, as well as the public at large, who benefit from strong railroads that are able to invest in infrastructure expansion and terminals. In addition, we are concerned that changes in the rules could result in service disruptions that would adversely affect all shippers.

I appreciate your time and consideration of my views, and I hope the Board will work to ensure a healthy freight rail network that continues to provide a true public benefit to our nation.

Sincerely,

Richard K. Rudie
 President
 Interdom Partners, Ltd.